

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

UNITED STATES OF AMERICA

v.

AKSHAY RAM KANCHARLA,

*Defendant.*

Case No. 1:22-mj-26

**CONSENT MOTION TO EXTEND TIME FOR INDICTMENT**

The United States of America, by and through its attorneys Jessica D. Aber, United States Attorney for the Eastern District of Virginia, and Bibeane Metsch, Assistant United States Attorney, with the express consent of the defendant Akshay Ram Kancharla, and the defendant's counsel, respectfully moves the Court to extend the time to indict this case through and including April 18, 2022. No prior motion to extend has been filed. In support thereof, the parties state as follows:

1. The defendant was arrested in the Middle District of Florida on February 17, 2022 on a criminal complaint charging him with distribution of a mixture or substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1). The defendant was released on conditions and made his initial appearance in this District on February 28, 2022. Christopher Bryan Amolsch represents the defendant. On March 3, 2022, the defendant was arrested on a pretrial release violation petition and remanded pending resolution of the petition. The defendant is now en route to this District and has waived the time for a preliminary hearing until his arrival to Virginia.

2. The Speedy Trial Act requires that the defendant be indicted within thirty days of the defendant's arrest after subtracting all excludable time. *See* 18 U.S.C. §§ 3161 *et seq.* The government's estimate of the date by which the Speedy Trial Act requires the filing of an indictment in this case is March 19, 2022. The parties jointly request that the deadline for the time to indict be extended by 30 days.

3. The defendant is now en route to this District. The government is preparing to provide pre-indictment discovery and anticipates the parties discussing the possibility of a pre-indictment plea resolution of this case. However, additional time is needed for the defendant to arrive in this District and to allow counsel to review discovery and conduct further investigation. Additional time would be in the interests of justice in that it would give the parties additional time to review the discovery materials and engage in plea discussions.

4. The defendant hereby agrees to waive any objections under the Speedy Trial Act and to extend the government's time to file an indictment in this case through and including April 18, 2022. The waiver is made knowingly, intentionally, and voluntarily by the defendant, and with full knowledge of the provisions of the Speedy Trial Act, Title 18, United States Code, Sections 3161, *et seq.*, and with the advice and consent of counsel.

5. The defendant expressly understands that his waiver is not predicated upon any promises, agreements, or understandings of any kind between the government and the defense in this case, and that nothing contained herein shall be construed to preclude the government from proceeding against the defendant during or after the time period covered by this waiver.

WHEREFORE, the parties request that the time to indict this case be extended to and including April 18, 2022 and that the delay resulting from this extension be excluded in

computing the time within which an indictment must be filed pursuant to Title 18, United States Code, Section 3161(h).

Respectfully submitted,

Jessica D. Aber  
United States Attorney

Date: March 14, 2022

By: /s/  
Bibeane Metsch  
Assistant United States Attorney